

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

E. JEAN CARROLL,

No. 20 Civ. 7311 (LAK)

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

**STIPULATION & [PROPOSED] ORDER
SUBSTITUTING COUNSEL**

IT IS HEREBY STIPULATED AND AGREED THAT on July 29, 2024, Plaintiff advised Hecker Fink LLP that she was discharging Hecker Fink LLP and wished to proceed with Kaplan Martin LLP as her sole attorneys in the above-entitled action;

IT IS FURTHER STIPULATED AND AGREED THAT subject to the approval of this Court, Kaplan Martin LLP be substituted as attorneys of record for Plaintiff E. Jean Carroll in the above-entitled action instead of Hecker Fink LLP as of the date hereof;

IT IS FURTHER STIPULATED AND AGREED THAT pursuant to Local Civil Rule 1.4, Hecker Fink LLP has advised Plaintiff and Kaplan Martin LLP that it is asserting a charging lien in this matter pursuant to New York State Judiciary Law § 475 and Plaintiff's engagement agreement with Hecker Fink (which at the time was known as Kaplan Hecker & Fink LLP);

IT IS FURTHER STIPULATED AND AGREED that the undersigned counsel will meet and confer and advise the Court no later than 60 days from the date of entry of this proposed order whether a ruling is requested with respect to any aspect of Hecker Fink's assertion of a charging lien,¹ including whether the issues are ripe or justiciable before the Court at that time.

¹ The judgment entered in this matter is presently on appeal to the Second Circuit, with briefing scheduled to commence in September 2024. Oral argument on the appeal from judgment in the related matter, *Carroll v. Trump*, 22 Civ. 10016 (LAK), is scheduled for September 6, 2024 in the Second Circuit.

E. Jean Carroll

KAPLAN MARTIN LLP



By: _____

Roberta A. Kaplan, Esq.
Kaplan Martin LLP
156 West 56th Street, Suite 207
New York, New York 10019
(212) 316-9500
rkaplan@kaplanmartin.com
Incoming counsel for Plaintiff

HECKER FINK LLP



By: _____

Shawn G. Crowley
Hecker Fink LLP
350 Fifth Avenue, 63rd Floor
New York, New York 10118
(212) 763-0889
scrowley@heckerfink.com
Outgoing counsel for Plaintiff

SO ORDERED:

Hon. Lewis A. Kaplan
United States District Judge

Dated: New York, New York

August 7, 2024

E. Jean Carroll
E. Jean Carroll

KAPLAN MARTIN LLP

By: _____

Roberta A. Kaplan, Esq.
Kaplan Martin LLP
156 West 56th Street, Suite 207
New York, New York 10019
(212) 316-9500
rkaplan@kaplanmartin.com
Incoming counsel for Plaintiff

HECKER FINK LLP

By: _____


Shawn G. Crowley
Hecker Fink LLP
350 Fifth Avenue, 63rd Floor
New York, New York 10118
(212) 763-0889
scrowley@heckerfink.com
Outgoing counsel for Plaintiff

SO ORDERED:

Hon. Lewis A. Kaplan
United States District Judge